

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHEET METAL WORKERS' INTERNATIONAL)	
ASSOCIATION, LOCAL NO. 73,)	
)	
and)	
)	
THE TRUSTEES of the SHEET METAL WORKERS)	
LOCAL NO. 73 PENSION FUND, SHEET METAL)	
WORKERS LOCAL NO. 73 WELFARE FUND; and)	
SHEET METAL WORKERS LOCAL NO. 73)	Case No. 18-cv-5500
ANNUITY FUND,)	
)	Judge Feinerman
Plaintiffs,)	
)	Magistrate Judge Finnegan
)	
v.)	
)	
METAL DESIGN LLC, an Illinois Limited Liability)	
Company; and ONE METAL DESIGN CORP., an Illinois)	
corporation,)	
)	
Defendants.)	

Agreed Motion for Entry of Judgment

Plaintiffs, Sheet Metal Workers' International Association, Local No. 73, et al. (hereinafter **"Plaintiffs" or "Fund"**) by and through their attorneys, Gregorio & Marco, Ltd. and Defendants Metal Design, LLC and One Metal Design Corp. (hereafter **"Defendants"**) by and through their attorney Burr E. Anderson, and Anderson Law Offices, PC hereby present this Agreed Motion for Entry of Memorandum of Judgment and Entry of an Agreed Order as to Liability against Defendants Metal Design, LLC and One Metal Design Corp. In support of their Motion, the parties state as follows:

1. Plaintiffs filed their lawsuit against Defendants Metal Design, LLC and One Metal Design Corp. on August 13, 2018.

2. Defendants retained counsel and filed their Answer to the Complaint on September 19, 2018.
3. Counsel for Defendants has indicated that the Defendants are or have ceased operations.
4. The parties through counsel have reviewed the pending litigation and determined that an Agreed Memorandum of Judgment and an Agreed Order as to Liability should be entered to resolve the pending lawsuit.
5. Attached to this Agreed Motion is a draft Order for entry of an Agreed Memorandum of Judgment (**Exhibit A**) and an Agreed Order as to Liability (**Exhibit B**). Such proposed Orders will also be submitted to this Court's proposed Order email.
6. Once entered, the Orders will terminate the pending litigation.

Wherefore, the parties request that Court enter the attached Agreed Memorandum of Judgment and Agreed Order as to Liability against Defendants One Metal Design, LLC and One Metal Design, Corp. and any further relief this Court deems just.

Respectfully submitted,

Sheet Metal Workers' International Association,
Local No. 73, et.al.

BY: /s/ Michael J. McGuire
Attorney for Plaintiffs

Metal Design, LLC and
One Metal Design, Corp.

BY: /s/ Burr E. Anderson
Attorney for Defendants

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